

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§ Chapter 11
Alexander E. Jones	§ Case No. 22-33553 (CML)
Debtor	§

**TEXAS PLAINTIFFS' NOTICE OF RULE 2004 DEPOSITION OF
PATRICK REILEY**

Please take notice that, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Rule 2004-1 of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), the Texas Plaintiffs Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine will take the oral deposition of Patrick Reiley. The deposition will commence on August 23, 2023, at 10:00 a.m. Central Time at Akin Gump Strauss Hauer & Feld LLP, 1111 Louisiana Street, 44th Floor, Houston, Texas 77002, or at such other date, time and place as the parties may agree.

Please be advised that the scope of the deposition includes, but is not limited to, any matter relevant to: (i) the Debtor’s Assets, liabilities and financial condition; (ii) Transfers and transactions involving the Debtor or his entities, directly or indirectly; (iii) Mr. Reiley’s business relationships with the Debtor, the Debtor’s family members, and the Debtor’s business associates, to the extent relevant to the Debtor or his business, directly or indirectly; (iv) any entities owned, managed, or operated by the Debtor, the Debtor’s family members, and the Debtor’s business associates; (v) any Transfers of real property to or from the Debtor; (vi) any topic in the Subchapter V Trustee’s Report; and (vii) any plan that may be introduced in the Debtor’s bankruptcy or in the bankruptcy of Free Speech Systems, LLC.¹ The Texas Plaintiffs

¹Capitalized terms undefined herein have the meaning ascribed to them in the *Notice of the Official Committee of Unsecured Creditors’ Bankruptcy Rule 2004 Examination of Patrick Reiley* [ECF No. 371].

reserve all rights regarding the scope of the deposition, including but not limited to their right to broaden the scope of the deposition prior to the commencement of the deposition.

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Dated: August 17, 2023

/s/ *Jennifer J. Hardy*

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CERTIFICATE OF SERVICE

I certify that on August 17, 2023, a true and correct copy of the foregoing was served on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Jennifer J. Hardy
Jennifer J. Hardy